

## **FACT SHEET**

### **INTENT TO REISSUE A HAZARDOUS WASTE MANAGEMENT PERMIT**

Facility Name: Safety-Kleen Systems, Inc.

Location: 215 Whitsett Road  
Nashville, Davidson County, Tennessee 37210

Installation ID Number: TND 98 147 4125

Facility Owner: Safety-Kleen Systems, Inc.  
5400 Legacy Drive, CLII, Bldg. 3  
Plano, Texas 75024

Facility Operator: Safety-Kleen Systems, Inc.  
215 Whitsett Road  
Nashville, Tennessee 37210

Facility Contact: Mr. Patrick W. Keely  
Environmental Compliance Manager  
Safety-Kleen Systems, Inc.  
261 Eiler Avenue  
Louisville, Kentucky 40214  
Phone: (502) 366-6065

Comment Period: Begins: July 3, 2003  
Ends: August 18, 2003

### **FACILITY DESCRIPTION**

Safety-Kleen Systems, Inc. is a 2.01 acre site located at 215 Whitsett Road, Nashville, Davidson County, Tennessee. It is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance, and dry cleaning. The company has been operating since 1968 offering solvent collection and reclamation services for its customers. The facility offers several services, which involve the accumulation, transfer, and storage of spent materials. The spent materials include petroleum naphtha parts washer solvent, aqueous solvent, immersion cleaner, dry cleaning waste, and paint waste. These materials are transported from this facility to one of the Safety-Kleen recycle centers, a contract reclaimer, or another permitted facility. Recycled materials from Safety-Kleen recycle centers and other products are delivered to this facility for distribution to customers.

### **PURPOSE**

This fact sheet is prepared pursuant to Tennessee Rule 1200-1-11-.07(7)(d) for the draft permit developed by the Tennessee Department of Environment and Conservation's (TDEC) Division of Solid Waste Management (DSWM). The purpose of this permitting process is to afford any interested persons the opportunity to evaluate the ability of the permittee to apply the applicable hazardous waste management requirements. The proposal is for the renewal permit to be

reissued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101, et. seq., and Tennessee Rule Chapter 1200-1-11, Hazardous Waste Management. The permit is prepared in accordance with the provisions of Tennessee Rule 1200-1-11-.07.

### **PERMIT HISTORY AND PROPOSED PERMIT**

The current permit (TNHW-073) was issued to Safety-Kleen Systems, Inc. on September 30, 1991, and was effective for ten (10) years. Tennessee Hazardous Waste Management Regulations require that the facility submit the renewal application before the current permit expires. Safety-Kleen Systems, Inc. submitted Part A and Part B hazardous waste permit renewal applications on May 18, 2001, to DSWM, thus, enabling the facility to continue to operate under the current permit until a final decision is made. The receipt of the Part A and B Applications was public noticed on June 18, 2001 in The Tennessean. Safety-Kleen Systems, Inc. held the pre-application public meeting for the renewal application on May 16, 2001, as public noticed on April 19, 2001 in The Tennessean. A few members of the community attended the meeting, but no comments were received at this meeting.

The current permit allows the facility to store a maximum quantity of 9,846 gallons of hazardous waste in containers in three storage areas (the Warehouse Container Storage Area, the Return and Fill Station, and the Paint Waste Metal Storage Shelter) and to store a maximum quantity of 30,000 gallons of hazardous waste in two tanks (the Spent Mineral Spirits Tank and the Used Antifreeze Tank). The proposed permit is for the continuance of two of the container storage areas (the Warehouse Container Storage Area and the Paint Waste Metal Storage Shelter) with a maximum quantity of 9,096 gallons and the 15,000-gallon Spent Mineral Spirits Tank. The Return and Fill Station has been reclassified as a miscellaneous unit with a maximum storage capacity of 296 gallons. The Used Antifreeze Tank was never used for the storage of hazardous waste, and the facility has no future plans to store hazardous waste in this tank. Therefore, this tank is not included in the proposed permit.

The current permit also contains the conditions for continued corrective action activities for solid waste management units (SWMUs) and areas of concern (AOCs) at the facility. Safety-Kleen Systems, Inc. shall be required to continue to investigate any releases of hazardous waste or hazardous constituents pursuant to this permit at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. These corrective action conditions also require notification of imminent hazards, and when applicable, compliance with the requirements developed under the land disposal restrictions and organic air emission standards.

As detailed on the attached SWMU and AOC Status Table, the proposed permit requires no further action for the six SWMUs established at the facility. Four of the units, SWMUs #1, #2, #4, and #5, are regulated as permitted units. SWMU #3 was closed under an approved closure plan in 1990, and a post-closure corrective action order was issued in 1998 for the cleanup of residual groundwater contamination. No further action is required for the soils. SWMU #6 was successfully closed in 1992 under an approved RCRA (Resource Conservation and Recovery Act of 1976) Closure Plan.

### **COMMENTS**

Copies of Safety-Kleen Systems, Inc.'s application, draft permit, fact sheet and public notice are available for public inspection at the Thompson Lane Branch Library, 380 Thompson Lane, Nashville, Tennessee 37211 (telephone 615-862-5873). These materials are also available for

public inspection during normal business hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays, at the TDEC Nashville Environmental Assistance Center, Public Access Area, 711 R.S. Gass Blvd., Nashville, Tennessee 37243 (telephone 615-687-7000); and at DSWM's Nashville Central Office located on the 5th Floor, L & C Tower, 401 Church Street, Nashville, Tennessee 37243-1535 (telephone 615-532-0780).

All persons, including the applicant, who believe that the tentative decision to reissue this permit is inappropriate must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by sending comments or requesting a public hearing to Ms. Angela Ivory; Treatment, Storage and Disposal Section; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone 615-532-9267 or e-mail to [Angela.Ivory@state.tn.us](mailto:Angela.Ivory@state.tn.us). Requests for a public hearing must state the nature of the issues proposed to be raised at the hearing. To assure consideration, comments or requests for a public hearing must be received by 4:30 p.m., August 18, 2003.

When DSWM makes a final permit decision to either issue or deny the permit, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision. The final permit decision shall become effective upon signing by the Director of DSWM.

Persons who wish to be on DSWM's mailing list should request a Mailing List Request form by calling or writing: Public Participation Officer; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone 615-532-0798 or e-mail [Solid.Waste@state.tn.us](mailto:Solid.Waste@state.tn.us).

**SWMU and AOC Status Table**

<b>SWMU/AOC Number/Letter</b>	<b>SWMU/AOC Name</b>	<b>Unit Description</b>	<b>Former Permit Status</b>	<b>Proposed Permit Status</b>	<b>Rationale</b>
1	Wet Dumpsters (2)	Used to transfer spent solvent from drums to the hazardous waste storage tank	No further action	No further action	This unit is regulated as a permitted miscellaneous unit
2	Aboveground Storage Tanks	The tank farm contains three aboveground horizontal tanks	No further action	No further action	Two of the three tanks contain clean mineral spirits and product and one is regulated as a permitted unit
3	Underground Storage Tanks	This SWMU consists of two 15,000-gallon underground storage tanks used to store fresh and spent petroleum naptha solvent	RCRA Closure Plan	No further action	These tanks were removed in 1990 under an approved closure plan; this SWMU is addressed under a post-closure corrective action order issued for the cleanup of residual groundwater contamination; no further action is required for the soils; a corrective action plan that addresses groundwater remediation has been approved by the Commissioner
4	Enclosed Shelter for Container Storage (Encompasses the Temporary Drum Storage Area)	This area is used for the storage of sediment from cleaning the drum washer in the return and fill station, spent immersion cleaner, dry cleaning wastes, branch contaminated debris, and aqueous parts cleaner waste	Regulated by the State's portion of the RCRA permit	No further action	This unit is regulated as a permitted unit
5	Flammable Material Storage Shed	This unit is a metal storage shelter used for the storage of paint waste	No further action	No further action	This unit is regulated as a permitted unit
6	Old Retention Pond and Drainage Ditch	Impacted soils in the area of this SWMU were removed from the site under a closure plan in 1992	RCRA Closure Plan	No further action	This area was successfully closed